

MAY 28 2019

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AT GREENBELT
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

Bryant Davidson
plaintiff

Civil No GJH-19-885

V

Corizone Insurance Company and Medical Services, Nursing Staff

Dr Sadag Ali, Medical Director, at M.T.C. 954 Forrest st, Baltimore

MD 21202

Dr Tadessa Tela, located at 954 Forrest, Baltimore, Md 21202 (M.T.C.)

DR Luka, Regional Director, at M.T.C. 954 Forrest st, Baltimore

MD 21202

Dr Luhar Mukesh /or Dr Mukesh Luhar, at M.T.C. 954 Forrest
st, Baltimore, MD 21202

Correctional Officer Green of Transportation detail located
at the Central Booking Intake Facility at 300 E. Madison st
Baltimore, MD 21203

Correctional Officer Erlie located at the Central Booking
Intake Facility at 300 E. Madison st, Baltimore, Md 21202

Corizone Nursing Staff on 3rd and 4th floor located at 954
Forrest st, Baltimore, md 21202

Defendants

Amended Complaint

listed above is a list of the defendants and their
respective institutions. However Corizone is a insurance
company and its whereabouts are not known to the
plaintiff as he doesn't have access to the internet. The
plaintiff would like to further add that on April 14, 2019
he was sent to the Emergency Room at University
Hospital whom ultimately wrote in its Summary Report

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that was released with the plaintiff's one copy provided to the plaintiff and the Central Booking Intake Facility the plaintiff is housed at) stated that "to show this note from University OF Maryland doctors to nurses and doctors at your institution that you are in pain when you are moved so extra nurses are needed." On April 14, 2018 I left the University OF Maryland and was transferred to the Metropolitan Transitional Center's hospital located at 954 Forrest St, Baltimore, MD 21202 where the Physician's Assistance on the first floor saw (she was given a copy of the University OF Maryland's findings regarding needing other nurses because of pain when being moved) the University OF Maryland paperwork. She then took it to the Medical Director Sadag Ali and also a defendant (the plaintiff also filed a complaint with the Board Of Physicians that Dr Sadag Ali was aware of at the time of his decision) whom told the Physician's Assistance to send me back to the Central Booking Intake Facility where he knew didn't have the staff or infirmary to house the plaintiff whom needed assistance. The plaintiff returned to the Central Booking Intake Facility in a cell without any assistance. A few nurses (inmates helped him move from his bed to his wheelchair or dress him, and to place him on the toilet. There are a series of Affidavits the plaintiff's counsel will forward to this court) where he remained from See PG 3 →

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April 14, 2019 until May 1, 2019, having to rely on the goodwill of other inmates. Quite often remaining in "urine and feces" stained clothes for days, missing medication because the plaintiff doesn't have help getting in his wheelchair and must remain in the bed. Dr. Luka, the Regional Director has knowingly kept the plaintiff in a wheelchair that didn't have the ability to lock so that when the plaintiff would get into the wheelchair with assistance of others it would spin in away from him causing him quit often to fall. Dr. Luka was also advised that nurses refused to assist him to get in the bed, wheelchair and or change clothes.

Dr. Luka further "threatened" the plaintiff (other inmates overheard this and signed Affidavits to that effect) when he wanted the plaintiff to enter a room with the "Head Of Nursing" and another "Nurse Practitioner" and the plaintiff advised Dr. Luka the Regional Director that the plaintiff's attorney advised him not enter a room with Defendants in a pending lawsuit with whom has made a prior allegation that you agreed to a medication regimen that you/plaintiff agree you did not. Dr. Luka, Regional Director stated "Either come in the room! If you're not going to come in the room I am going to send you back to your institution." The plaintiff had yet to begin or complete "Physical Therapy" or to see a "Neurologist" so the plaintiff's condition

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remained the same but still Dr Luka, Regional Director "threatened" to send him back to his institution because he chose to follow his attorney's recommendations (Affidavits will be sent as Exhibits from the Law Offices OF Thomas Marone)

University OF Maryland further stated in other medical Summary Releases that University OF Maryland's Physical Therapy recommended I/plaintiff use a wheelchair not a Walker however both Dr Luka, Regional Director and Dr Tadessa Tela refused to listen causing the plaintiff to endure to "sprain ankles". As a result they both refused to put a consult in to see a Orthopedist, as well as Nurse Practitioner Suzanne. (There are Affidavits to support this that will be forwarded from my attorney's office) The plaintiff requests 1 million in punitive damages for "failure OF Duty Of Care".
IT is this 23 day of May 2019

Respectfully Submitted

Bryant Davison

#1580499 / M.T.C. 954

Forrest St, Baltimore, MD

21203

May 23 2019

Dear Magistrate

I am writing this Amendment

and sending it out in another inmates name whom is allowing me to because I dont believe it will make it to you otherwise. As I have written my attorney and that has never made it there. There is also no "privilege communication" between a attorney and his ^{client} because GTL phone company refuses to list it on each inmates phone thus allowing them to listen to each inmates calls. The Division of Correction has long been a arm of the prosecution and it is Division of Corrections whom are capable of listening to our conversation. I am sorry I did not list this before however I am a layman. Please place GTL phone company as a defendant for 14th Amendment Violations, violating our right to the Effective Assistance of Counsel by listening to our calls with our attorney thus giving the prosecution away to prepare for our defense. This million dollar company has the capabilities to list our calls as Attorney Calls, without any regulation of them how can it be determined our rights are ensured. I seek only a federal ruling to change this illegal procedure.

Bryant Dandar